

From: [Heeley, Donald \(DEP\)](#)
To: [Bazenas, Ted](#)
Cc: [Kronopolus, John \(DEP\)](#); [Blackman, Anne \(DEP\)](#); [Levins, Gregory \(DEP\)](#)
Subject: 35 Pearl St LLC-Webster, MA
Date: Tuesday, September 29, 2015 12:52:30 PM
Attachments: [webster-2.pdf](#)
[Webster-Pearl35St-06-29-15-1A 005.JPG](#)
[aec_labs.pdf](#)

Greetings Ted,

Per your request I am submitting the contact information and pictures of the fire damaged building and asbestos containing/contaminated demolition debris at 35 Pearl Street, Webster, MA. The mill is owned by 35 Pearl St. LLC. The LLC's resident agent, SOC signatory and the sole manager is Walter G. Mahla, 23 Rhodes Drive, Wrentham, MA 02093. The LLC is represented by Michael P. Doherty of Doherty, Ciechanowski, Dugan & Cannon P.C., 124 Grove Street, Suite 220, Franklin, MA 02038 (508) 541-3000.

The mill building was destroyed by a catastrophic fire on June 25, 2015. The former mill complex is situated on approximately 9 acres located in a congested residential/commercial/industrial area of Webster, MA. The general public is in close proximity of this area. An apartment complex with basketball courts and a toddler playground are situated directly across the street from the fire site. Immediately after the fire, the Central Region MassDEP asbestos program was made aware through information obtained from a DLS licensed asbestos contractor and also a DLS licensed asbestos inspector retained by the property owner that exterior and interior asbestos containing materials were present throughout the buildings. The DLS licensed asbestos inspector provided MassDEP's asbestos program with the asbestos sampling results and a partial asbestos survey of the buildings. I have attached the sample results to this email for your review.

A few days after the fire, The MassDEP asbestos program conducted an inspection of the property accompanied by the aforementioned DLS licensed asbestos contractor and observed significant quantities of friable asbestos containing materials and non-friable asbestos containing materials that have been rendered friable co-mingled throughout the fire/demolition debris at the site. Based on our site observations and the sampling results, MassDEP considers all of the fire/demolition debris to be asbestos containing/asbestos contaminated. I have attached some pictures to this email for your review.

Subsequent to the fire, MassDEP has been in close contact with the property owners attempting to expedite the immediate cleanup and decontamination of the asbestos contaminated fire/demolition debris at the site. 35 Pearl St. LLC did retain an asbestos consultant who worked with the Department to develop a Non-Traditional Asbestos Abatement Work Plan that when implemented would bring the site back into compliance. After several drafts, the document was revised to the point where MassDEP indicated that it could approve the plan once the plan and permit application were formally submitted and the permit fee paid.

The Department was then informed by 35 Pearl St. LLC's environmental attorney, Donald Anglehart, that these documents would not be filed until a contractor had been retained to do the work. In numerous subsequent phone conversations and again in a recent meeting held on September 25, 2015 at the MassDEP's Central Region office, Mr. Anglehart he informed the Department that after receiving and reviewing the bids, his client does not have the money to conduct the necessary cleanup of the asbestos containing and asbestos contaminated fire/demolition debris. Mr. Anglehart has stated that the bids he received to conduct the required remedial work ranged from \$1.4 million

dollars to \$1.8 million dollars. He also stated that the estimates he received for the value of the sizeable amounts of steel remaining on site ranged from \$250,000-\$500,000.

MassDEP's Central Region Deputy Regional Director, Senior Regional Counsel and Asbestos Coordinator believe there is an immediate need to perform the cleanup and decontamination of this property to prevent any possible migration of asbestos fibers and migration of possible unknown hazardous materials off the site via the ambient air or water pathways.

MassDEP is requesting the United States Environmental Protection Agency, Removal Program review this information to consider mobilizing to remediate this site as soon as possible.

Please contact me Gregory Levins, asbestos coordinator @ 508 767-2768 for further assistance.

Thank you



AEC Laboratories, LLC

MA License: AA000197

CT License: PH-0124

VT License: AL877888

RI License: AAL-112A1

ME License: LB-0074

July 02, 2015

Client Name and Address:

LBP Solutions, LLC
13 Bird Street Suite 6
Foxboro, MA 02035

Re: Bulk Asbestos Results from Webster Factory

35 Pearl Street; Webster, MA

Client Project Number: Not Provided

AEC Laboratory Number: **013760.00**

Dear Ronald Jacobs,

We at AEC Laboratories, LLC would like to thank you for your recent business. 15 sample(s) were received on 07/01/2015 from a job located at 35 Pearl Street; Webster, MA for 24 Hour Turn Around Time. The final report is enclosed for the aforementioned samples.

Please note that this report conforms to all applicable State and Federal requirements. AEC Laboratories, LLC follows prescribed procedures for the analysis of bulk materials to identify and quantify asbestos type and content.

These results only pertain to this job and should not be used in the interpretation of any other job. This report may be reproduced only in its entirety.

Client confidentiality is strictly implemented. Test results or any other information regarding samples received by AEC Laboratories shall not be disclosed to a third party without the client's written permission or a compelling legal or court document.

If you have any questions please do not hesitate to call me at the number below.

Regards,

Valerica Stanca
Laboratory Manager

Enclosures:

- Analytical results
- Chain of Custody
- Client Communications and/or Project Unconformities (If Applicable)



AEC Laboratories, LLC

814 Broad Street - Weymouth, MA 02189 - Ph. 781.337.0567

Client: LBP Solutions, LLC
13 Bird Street Suite 6
Foxboro, MA 02035

AEC Laboratories Project Number: 13760
Client Project Number: Not Provided

Attention: Ronald Jacobs

Phone: 844-527-5323

Fax: 744-215-5275

Re: Webster Factory

Date Sampled: 6/30/2015

Date Received: 7/01/2015

Date Analyzed: 7/02/2015

Date Reported: 7/02/2015

35 Pearl Street; Webster, MA

Analysis by EPA Method 600/R-93/116

| Client Sample/ HA ID | Laboratory Sample ID | Location | Description | Asbestos Type(s) | % | Other Materials | % | Asbestos Present | Total Asbestos % |
|---------------------------------------|-------------------------|--|---|---------------------|----|-------------------------|----------|---------------------|---------------------|
| 01 | 13760-01 | On Soil Next to I-Beams - Front Corner | Black, Heterogeneous, Tar Paper; Black | | | Cellulose Nonfibrous | 35 65 | No | NAD |
| Analyzed by: VS Date Analyzed: 7/2/15 | | | | | | | | | |
| 02 | 13760-02 | Metal Pile - Front Corner | Black, Heterogeneous, Mop Coat; Black | Chrysotile | <1 | Cellulose Nonfibrous | 10 90 | Yes | <1 |
| Analyzed by: VS Date Analyzed: 7/2/15 | | | | | | | | | |
| 03 | 13760-03 | Metal I-Beam - Front Corner | Black, Heterogeneous, Mop Coat; Black | Chrysotile | 2 | Cellulose Nonfibrous | <1 98 | Yes | 2 |
| Analyzed by: VS Date Analyzed: 7/2/15 | | | | | | | | | |
| 04 | 13760-04.1 | Along Side Pearl St - Pile of Metal | Black, Heterogeneous, Asphalt Roofing; Black | Chrysotile | 5 | Cellulose Nonfibrous | 5 90 | Yes | 5 |
| Analyzed by: VS Date Analyzed: 7/2/15 | | | | | | | | | |
| 04 | 13760-04.2 | Along Side Pearl St - Pile of Metal | White, Heterogeneous, Asphalt Roofing, Black | Chrysotile | 35 | Cellulose Nonfibrous | 25 40 | Yes | 35 |

Comments: Sample stucked to the asphalt roofing and appears to be insulation

Analyzed by: VS Date Analyzed: 7/2/15

Reporting Notes: NAD = "No Asbestos Detected" PS = "Positive Stop" PR = "Present" <1% = Trace Due to inherent Polarized Light Microscope limitations, fibers and/or bundles below the resolution of the light microscope (approximately <25 microns in width) will not be detected. "NAD" and "Trace" samples should be confirmed by Transmission Electron Microscopy. AEC Laboratories, LLC (AEC) maintains liability limited to cost of analysis only. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by AEC. AEC is not responsible for sample collection activities or analytical limitations. Interpretation and use of results are the responsibility of the client. AEC retains all samples for thirty (30) days after reporting. After this period AEC will dispose of all samples according to all local, state, and federal guidelines, unless requested in writing by the client. All results are expressed as a percentage based on Calibrated Visual Estimate (CVE), unless otherwise noted. Distinct layers are noted by .1, .2, etc. suffixes to lab ID.



AEC Laboratories, LLC

814 Broad Street - Weymouth, MA 02189 - Ph. 781.337.0567

Client: LBP Solutions, LLC
13 Bird Street Suite 6
Foxboro, MA 02035

AEC Laboratories Project Number: 13760
Client Project Number: Not Provided

Attention: Ronald Jacobs

Phone: 844-527-5323

Fax: 744-215-5275

Date Sampled: 6/30/2015

Date Received: 7/01/2015

Date Analyzed: 7/02/2015

Date Reported: 7/02/2015

Re: Webster Factory

35 Pearl Street, Webster, MA

Analysis by EPA Method 600/R-93/116

| Client Sample/ HA ID | Laboratory Sample ID | Location | Description | Asbestos Type(s) | % | Other Materials | % | Asbestos Present | Total Asbestos % |
|----------------------------|-------------------------|---|--|---------------------|----|--|---------------|---------------------|---------------------|
| 05 | 13760-05 | Along Side Pearl St - Pile of Metal | Black, Heterogeneous, Pipe Insulation - Black | Chrysotile | <1 | Cellulose Fibrous Glass Nonfibrous | 65 2 33 | Yes | <1 |

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|---|--|------------|---|--|---------------|-----|---|
| 06 | 13760-06 | Along Side Pearl St - Pile of Metal | Brown, Heterogeneous, Pipe Insulation - Brown | Chrysotile | 2 | Cellulose Fibrous Glass Nonfibrous | 95 <1 3 | Yes | 2 |
|----|----------|---|--|------------|---|--|---------------|-----|---|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|--------------|--|--|--|--|---------------|----|-----|
| 07 | 13760-07 | Front Corner | Black, Heterogeneous, Felt Roof Paper - Black | | | Cellulose Fibrous Glass Nonfibrous | 45 2 53 | No | NAD |
|----|----------|--------------|--|--|--|--|---------------|----|-----|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|------------------------------------|--|---------|----|------------|----|-----|----|
| 08 | 13760-08 | Debris on Soil Next to Pearl St | Grey, Heterogeneous, Pipe Insulation - Gray | Amosite | 55 | Nonfibrous | 45 | Yes | 55 |
|----|----------|------------------------------------|--|---------|----|------------|----|-----|----|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|----------------------|---|------------|---|-------------------------|----------|-----|---|
| 09 | 13760-09 | Cinder Block Pile | Black, Heterogeneous, Mastic on CB - Black | Chrysotile | 2 | Cellulose Nonfibrous | 10 88 | Yes | 2 |
|----|----------|----------------------|---|------------|---|-------------------------|----------|-----|---|

Analyzed by: VS Date Analyzed: 7/2/15

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Client: LBP Solutions, LLC
13 Bird Street Suite 6
Foxboro, MA 02035

AEC Laboratories Project Number: 13760
Client Project Number: Not Provided

Attention: Ronald Jacobs

Phone: 844-527-5323

Fax: 744-215-5275

Re: Webster Factory

Date Sampled: 6/30/2015

Date Received: 7/01/2015

Date Analyzed: 7/02/2015

Date Reported: 7/02/2015

35 Pearl Street; Webster, MA

Analysis by EPA Method 600/R-93/116

| Client Sample/ HA ID | Laboratory Sample ID | Location | Description | Asbestos Type(s) | % | Other Materials | % | Asbestos Present | Total Asbestos % |
|----------------------------|-------------------------|-------------------------------|--|---------------------|---|--------------------|-----|---------------------|---------------------|
| 10 | 13760-10 | Debris Pile Middle of Site | Red, Homogenous, 12 X 12 Floor Tile | | | Nonfibrous | 100 | No | NAD |

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|-------------------------------|--|--|--|--|-----------------|----|-----|
| 11 | 13760-11 | Debris Pile Middle of Site | Tan, Heterogeneous, Assoc. Mastic - Tan | | | Cellulose Fibrous Glass Nonfibrous | <1 <1 100 | No | NAD |
|----|----------|-------------------------------|--|--|--|--|-----------------|----|-----|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|-----------------------------|---|------------|----|------------|----|-----|----|
| 12 | 13760-12 | Access Road to Boiler Rm | Grey, Heterogeneous, Cement Board | Chrysotile | 30 | Nonfibrous | 70 | Yes | 30 |
|----|----------|-----------------------------|---|------------|----|------------|----|-----|----|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|--------------------------|--|-----------------------|----------|--------------------------|----------|-----|----|
| 13 | 13760-13 | Adjacent to Boiler Rm | Grey, Heterogeneous, Pipe Insulation - Gray | Chrysotile Amosite | 10 35 | Nonfibrous Nonfibrous | 10 45 | Yes | 45 |
|----|----------|--------------------------|--|-----------------------|----------|--------------------------|----------|-----|----|

Analyzed by: VS Date Analyzed: 7/2/15

| | | | | | | | | | |
|----|----------|----------------|--|------------|----|-------------------------|----------|-----|----|
| 14 | 13760-14 | Boiler Rm Area | Grey, Heterogeneous, Pipe Insulation - Gray | Chrysotile | 70 | Cellulose Nonfibrous | 20 10 | Yes | 70 |
|----|----------|----------------|--|------------|----|-------------------------|----------|-----|----|

Analyzed by: VS Date Analyzed: 7/2/15

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AEC
Laboratories, LLC

814 Broad Street - Weymouth, MA 02189 - Ph. 781.337.0567

Client: LBP Solutions, LLC
13 Bird Street Suite 6
Foxboro, MA 02035

AEC Laboratories Project Number: 13760
Client Project Number: Not Provided

Attention: Ronald Jacobs

Phone: 844-527-5323

Fax: 744-215-5275

Re: Webster Factory

Date Sampled: 6/30/2015

Date Received: 7/01/2015

Date Analyzed: 7/02/2015

Date Reported: 7/02/2015

35 Pearl Street; Webster, MA

| Client | | Analysis by EPA Method 600/R-93/116 | | | | | | | | |
|------------------|-------------------------|-------------------------------------|---|---------------------|----|-------------------------|----------|---------------------|---------------------|--|
| Sample/ HA ID | Laboratory Sample ID | Location | Description | Asbestos Type(s) | % | Other Materials | % | Asbestos Present | Total Asbestos % | |
| 15 | 13760-15 | Metal Pile Next to Pearl St | Grey, Heterogeneous, Pipe Debris - Gray | Chrysotile | 65 | Cellulose Nonfibrous | 25 10 | Yes | 65 | |

Analyzed by: VS Date Analyzed: 7/2/15

Reviewed by: Valerica Stanca

Analyzed by: Valerica Stanca

Signature:

Valerica Stanca

Signature:

Valerica Stanca

Reporting Notes: NAD = "No Asbestos Detected" PS = "Positive Stop" PR = "Present" <1% = Trace Due to inherent Polarized Light Microscope limitations, fibers and/or bundles below the resolution of the light microscope (approximately <25 microns in width) will not be detected. "NAD" and "Trace" samples should be confirmed by Transmission Electron Microscopy. AEC Laboratories, LLC (AEC) maintains liability limited to cost of analysis only. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by AEC. AEC is not responsible for sample collection activities or analytical limitations. Interpretation and use of results are the responsibility of the client. AEC retains all samples for thirty (30) days after reporting. After this period AEC will dispose of all samples according to all local, state, and federal guidelines, unless requested in writing by the client. All results are expressed as a percentage based on Calibrated Visual Estimate (CVE), unless otherwise noted. Distinct layers are noted by .1, .2, etc. suffixes to lab ID.

| Relinquished by: <u>Ronald Jones</u> Date/Time: <u>6/30/15 FedEx</u> Received by: <u>Ashley Cabaret</u> Date/Time: <u>7/1/15 12:19pm</u> Relinquished by: _____ Date/Time: _____ Received by: _____ Date/Time: _____ | | AEC Laboratories, LLC 814 Broad Street Weymouth, MA 02189 Phone: 781-337-0567 Fax: 781-337-0986 labreports@americanenviron.com | | | |
|---|----------|--|-------------------------|------------------|---------------|
| Client Name: <u>LBP Solutions</u> Phone: <u>844-527-5323</u> Client Address: <u>13 Bird St., Suite 6, Foxboro, MA 02035</u> Project: <u>Webster Factory</u> Proj. Address: <u>35 Pearl ST, Webster</u> State (Required): <u>MA</u> | | Page <u>1</u> of <u>1</u> BULK SAMPLE CHAIN OF CUSTODY | | | |
| Analysis: <input checked="" type="checkbox"/> PLM <input type="checkbox"/> Positive Stop <input type="checkbox"/> Qualitative <input type="checkbox"/> Point Count <input type="checkbox"/> NOB Prep <input type="checkbox"/> TEM Chat <input type="checkbox"/> Lead <input type="checkbox"/> PCB Turnaround Time: <input type="checkbox"/> RUSH <input checked="" type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input type="checkbox"/> 3 Day <input type="checkbox"/> 5 Day Sampled By: <u>Ronald Jones</u> Verbal Results: <u>Y/N</u> Date: <u>6/30/15</u> Cell #: _____ Results to (PM): _____ Name: _____ | | AEC Laboratories ID: <u>13160</u> Special Instructions: _____ | | | |
| LAB ID | FIELD ID | LOCATION | SAMPLE DESCRIPTION | Homogen-ous Area | Material Type |
| | 01 | On Soil next to I-Beams - Front Corner | Tar Paper; Black | | |
| | 02 | Map Metal Pipe - Front Corner | Map Coat; Black | | |
| | 03 | Metal I-Beam - Front Corner | Map Coat; Black | | |
| | 04 | Along side Pearl ST > Pile of Metal | Asphalt Roofing; Black | | |
| | 05 | Along side Pearl ST | Pipe Insulation Black | | |
| | 06 | ↓ | Pipe Insulation - Brown | | |
| | 07 | Front Corner | Felt Roof Paper - Black | | |
| | 08 | Debris on Soil next to Pearl ST | Pipe Insulation - Gray | | |
| | 09 | Cinder block Pile | Mastic on CB - Black | | |
| | 10 | Debris Pile Middle of site | 12x12 Floor Tile | | |
| | 11 | Ac ↓ | Assoc. Mastic - Tan | | |
| | 12 | Access Road to Boiler Rm | Cement Board | | |
| | 13 | Adjacent to Boiler Rm | Pipe Insulation - Gray | | |
| | 14 | Boiler Rm AREA | Pipe Insulation - Gray | | |
| | 15 | Metal Pile next to Pearl ST | Pipe Debris - Gray | | |

All Suspect Materials
Webster Factory – 35 Pearl St – Webster – MA

| Field ID | Description | Location | Color | Quantity | Lab ID |
|----------|-------------------------|--|-------|----------|------------|
| 01 | Tar Paper; Black | On Soil Next to I-Beams - Front Corner | Black | | 13760-01 |
| 02 | Mop Coat; Black | Metal Pile - Front Corner | Black | | 13760-02 |
| 03 | Mop Coat; Black | Metal I-Beam - Front Corner | Black | | 13760-03 |
| 04 | Asphalt Roofing; Black | Along Side Pearl St - Pile of Metal | Black | | 13760-04.1 |
| 04 | Asphalt Roofing; Black | Along Side Pearl St - Pile of Metal | White | | 13760-04.2 |
| 05 | Pipe Insulation - Black | Along Side Pearl St - Pile of Metal | Black | | 13760-05 |
| 06 | Pipe Insulation - Brown | Along Side Pearl St - Pile of Metal | Brown | | 13760-06 |
| 07 | Felt Roof Paper - Black | Front Corner | Black | | 13760-07 |
| 08 | Pipe Insulation - Gray | Debris on Soil Next to Pearl St | Grey | | 13760-08 |
| 09 | Mastic on CB - Black | Cinder Block Pile | Black | | 13760-09 |
| 10 | 12 X 12 Floor Tile | Debris Pile Middle of Site | Red | | 13760-10 |
| 11 | Assoc. Mastic - Tan | Debris Pile Middle of Site | Tan | | 13760-11 |
| 12 | Cement Board | Access Road to Boiler Rm | Grey | | 13760-12 |
| 13 | Pipe Insulation - Gray | Adjacent to Boiler Rm | Grey | | 13760-13 |
| 14 | Pipe Insulation - Gray | Boiler Rm Area | Grey | | 13760-14 |
| 15 | Pipe Debris - Gray | Metal Pile Next to Pearl St | Grey | | 13760-15 |

35 Pearl Street

35 Pearl St. Current Conditions





From: [Heeley, Donald \(DEP\)](#)
To: [Bazenas, Ted](#)
Cc: [Levins, Gregory \(DEP\)](#)
Subject: 35 Pearl St LLC/Webster pics
Date: Tuesday, September 29, 2015 1:21:31 PM
Attachments: [Webster-Pearl35St-06-30-15-1B_003.JPG](#)
[Webster-Pearl35St-06-30-15-1B_018.JPG](#)
[Webster-Pearl35St-06-30-15-1B_036.JPG](#)
[Webster-Pearl35St-06-30-15-1B_040.JPG](#)

Greetings Ted,,

I am enclosing a few more pictures of the 35 Pearl St ,Webster MA site for your viewing.

Thank you

Regards Don Heeley/asbestos program

MassDEO/CERO

508-849-4044







